

NORTHEAST UTILITIES

THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
HOLYOKE WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

General Offices • Seiden Street, Berlin, Connecticut

P.O. BOX 270
HARTFORD, CONNECTICUT 06141-0270
(203) 665-5000

October 3, 1991

Docket No. 50-336

A09850

Re: Employee Concerns

Mr. Charles W. Hehl, Director
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Dear Mr. Hehl:

Millstone Nuclear Power Station, Unit No. 2
RI-91-A-0229

We have completed our review of an identified issue concerning activities at Millstone Station. As requested in your transmittal letter, our response does not contain any personal privacy, proprietary, or safeguards information. The material contained in this response may be released to the public and placed in the NRC Public Document Room at your discretion. The NRC transmittal letter and our response have received controlled and limited distribution on a "need-to-know" basis during the preparation of this response.

ISSUE 0229:

"The flood protection water resistant 'can' was installed over the 'B' service water pump motor on August 19, 1991, while making preparations for Hurricane Bob. This process required disconnecting the 4160 volt power supply cable from the motor.

"A 'ground cart' was installed in the pump motor breaker position for personnel protection. However, it was not safety tagged as required by procedure item 3.4 of MP 2721C, Protection and Restoration of Service Water Pump Motors During APMH, until this deficiency was identified by an electrician.

"In addition, problems exist with the adequacy of maintenance procedure MP 2721C and its references to the FSAR."

REQUEST:

"Please discuss the validity of this assertion. Please discuss actions taken to ensure personnel safety and procedure compliance with regard to MP 2721C and its references to the FSAR."

9202040129 911106
PDR ADDCK 05000336
P PDR

Mr. Charles W. Hehl, Director
A09850/Page 2
October 3, 1991

RESPONSE 0229:

The section of the assertion relating to tagging is valid as stated. Section 3.3 of Maintenance Procedure MP 2721C--Protection and Restoration of Service Water Pump Motors During a PMH (Postulated Maximum Hurricane)--specifies the breakers and heater circuits to be tagged open and specifies that the Shift Supervisor will determine which items will be tagged to render the job safe. Guidance for tagging is provided by Administrative Control procedure ACP-QA-2.06--Station Tagging. This ACP states that "When temporary grounds are installed, they will be red or blue tagged at the request of the Job Supervisor in accordance with this procedure. . . . All Grounds will be tagged as part of the electrical clearance for which they are used."

For the work at issue, a ground cart was used in lieu of workman's grounds for grounding the service water pump motor breaker. The ground cart is a device which is positioned inside the breaker cubicle. Once it is in place it cannot be tagged directly. Therefore, the elevator mechanism used to raise and lower the ground cart is normally tagged in the "racked-up" position. The tag-out sheet indicates that the service water pump motor breaker was tagged on August 19, 1991, but the breaker cubicle elevator mechanism was not tagged until August 20, 1991. The work to install the pump motor cover was completed on August 19, 1991; however, the tag clearance remained open to support the re-termination work.

Since the service water pump breaker was tagged throughout the evolution and the ground cart was in place for grounding the breaker, there was no concern for personnel safety. That a tag was not initially hung on the elevator mechanism or transferred from the breaker to the elevator mechanism after the breaker was removed from the cubicle was not in conformance with ACP-QA-2.06A. A document acknowledgment sheet, emphasizing the grounding requirements in ACP-QA-2.06A, is being circulated to the Shift Supervisors and Senior Control Operators who are involved in tag clearance preparation.

The section of the assertion relating to the maintenance procedure and its FSAR reference is not valid.

During the review and approval process for the Millstone Unit No. 2 operating license, the NRC Staff asked several questions which, along with NNECO's answers, were entered into the Millstone Unit No. 2 Final Safety Analysis Report (FSAR). The FSAR reference in procedure MP 2721C was to FSAR Question 2.3.7. The subject of this FSAR Question was the emergency action plan for hurricanes and coincident wave action. Therefore, the procedure reference was correct. If someone not familiar with the question and answer process and the organization of the FSAR referred to Section 2.3.7 of the FSAR, the reference would appear erroneous.


In an effort to eliminate possible future confusion, the procedure reference will be revised. A reference to Technical Specification Section 3.7.5.1--Flood Level will replace the old reference.

Mr. Charles W. Hehl, Director
A09850/Page 3
October 3, 1991

After our review and evaluation of this issue, we find that this issue did not present any indication of a compromise of nuclear or personnel safety. We were not aware that this issue was a concern prior to the receipt of the NRC letter. We appreciate the opportunity to respond and explain the basis of our actions. Please contact my staff if there are further questions on any of these matters.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY


Edward J. Mroczka
Senior Vice President

cc: W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3
E. C. Wenzinger, Chief Projects Branch No. 4, Division of Reactor
Projects
E. M. Kelly, Chief, Reactor Projects Section 4A
J. T. Shedlosky, U.S. Nuclear Regulatory Commission, Millstone